

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-MDL-1570 (GBD) (SN) ECF Case
This document relates to: <i>Betso et al v. Islamic Republic of Iran</i>	Case No. 21-cv-01394 (GBD) (SN) ECF Case

**PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL
FINAL JUDGMENTS ON BEHALF OF BETSO PLAINTIFFS**

PLEASE TAKE NOTICE that, upon the accompanying declaration of Nicholas Papain (the “Papain Declaration”), with exhibits, and the accompanying memorandum of law, together with the evidence filed in the above-captioned multidistrict litigation, the Plaintiffs identified in Exhibits (“Ex.”) A and B to the Papain Declaration (the “*Betso* Plaintiffs”), by and through their undersigned counsel, respectfully move this Court:

- (1) for an order of judgment by default as to liability against the Islamic Republic of Iran (“Iran”) and in favor of the *Betso* plaintiffs, pursuant to 28 U.S.C. §1605A;
- (2) for a final order of partial judgment against Iran awarding each of the *Betso* Plaintiffs identified in Ex. A to the Papain Declaration, as the personal representative of the estate of a U.S. citizen who developed a severe medical condition that ultimately killed them (“Latent Injury Decedent”) as a direct result of the terrorist attacks that took place on September 11, 2001 (“9/11 Terrorist Attacks”), compensatory damages for the Latent Injury Decedent’s pain and suffering in the amounts of \$7,000,000 per estate to each Latent Injury Decedent’s estate as set forth in Ex. A to the Papain Declaration;
- (3) for a final order of partial judgment against Iran awarding each of the *Betso* Plaintiffs identified in Ex. B to the Papain Declaration, as the spouse, parent, child, or sibling

of a Latent Injury Decedent, each of whom was a U.S. Citizen, solatium damages for the losses they suffered in the amounts set forth in Ex. B to the Papain Declaration;

- (4) for an order awarding prejudgment interest at a rate of 4.96 percent per annum, compounded annually, from September 11, 2001, to the date of judgment; and
- (5) for an order permitting the *Betso* Plaintiff herein to submit future applications for economic damages, punitive damages, and/or other damages at a later date, consistent with any future rulings made by this Court.

A Proposed Order of Judgment is being filed simultaneously with this Notice.

Dated: May 7, 2024

Respectfully submitted,



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